

EXHIBIT A


Re: Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

Britt Martin <bmartin0211@outlook.com>

Fri 7/5/2024 1:03 PM

To: Hatch, Daniel <hatchd@butzel.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>; Silver, Lee <silver@butzel.com>; Burk, Tyler A. <burkt@butzel.com>; Galla, Danielle <galla@butzel.com>

 1 attachments (149 KB)

S^O for Extension.pdf;

All,

I am writing to request an extension of time to file my response in opposition to Defendants' motion to strike and seal my first amended complaint by an additional five days, making the new deadline for filing the response Wednesday, July 10, 2024.

Fed. R. Civ. P. Rule 6(b)(1)(A) provides that a Court may, for good cause, extend the time for an act to be done if a party makes such a request before the original time or its extension expires.

My deadline has not yet expired and good cause exists because:

1. Additional time is needed to conduct thorough legal research to ensure all relevant legal standards and precedents are appropriately addressed in the response.
2. Recent developments in the case have required adjustments to my response strategy, necessitating additional time
3. The sheer volume of material referenced and the number of objections raised in Defendants' motion require substantial time to review and address adequately.
4. The need to carefully review and cross-reference a significant number of documents and exhibits cited in the motion requires additional time to ensure a thorough and accurate response.

Attached is a proposed stipulated order for your review and signature.

Please let me know if you will concur with my request or oppose my request.

Thank you,

Brittany E. Martin

E: bmartin0211@outlook.com

P: (616) 822-9423

From: Hatch, Daniel <hatchd@butzel.com>

Sent: Monday, July 1, 2024 12:30 PM

To: Britt Martin <bmartin0211@outlook.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>; Silver, Lee <silver@butzel.com>; Burk, Tyler A. <burkt@butzel.com>; Galla, Danielle <galla@butzel.com>

Subject: RE: Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

Thanks. Talk to you on Wednesday at 12:30 p.m.

Daniel Hatch

Shareholder

hatchd@butzel.com

Direct: (616) 752-7224 | Mobile: (616) 250-1307



Main: 616.988.5600 | Fax: 616.988.5606

300 Ottawa Ave. NW, Suite 620 | Grand Rapids, MI 49503



From: Britt Martin <bmartin0211@outlook.com>

Sent: Monday, July 1, 2024 12:29 PM

To: Hatch, Daniel <hatchd@butzel.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>; Silver, Lee <silver@butzel.com>; Burk, Tyler A. <burkt@butzel.com>; Galla, Danielle <galla@butzel.com>

Subject: [EXTERNAL] Re: Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

You can call my cell: (616) 822-9423

Brittany E. Martin

Sent from my iPhone

From: Hatch, Daniel <hatchd@butzel.com>

Sent: Monday, July 1, 2024 12:26:28 PM

To: Britt Martin <bmartin0211@outlook.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>; Silver, Lee <silver@butzel.com>; Burk, Tyler A. <burkt@butzel.com>; Galla, Danielle <galla@butzel.com>

Subject: RE: Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

What number would you like me to call?

@Danielle – please calendar this call.

Daniel Hatch

Shareholder

hatchd@butzel.com

Direct: (616) 752-7224 | Mobile: (616) 250-1307



Main: 616.988.5600 | Fax: 616.988.5606

300 Ottawa Ave. NW, Suite 620 | Grand Rapids, MI 49503



From: Britt Martin <bmartin0211@outlook.com>

Sent: Monday, July 1, 2024 12:25 PM

To: Hatch, Daniel <hatchd@butzel.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>; Silver, Lee <silver@butzel.com>; Burk, Tyler A. <burkt@butzel.com>

Subject: [EXTERNAL] Re: Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

Dan,

I have family coming in for the holiday but I will try to make Wednesday at 12:30 work.

Brittany E. Martin

Sent from my iPhone

From: Hatch, Daniel <hatchd@butzel.com>

Sent: Monday, July 1, 2024 8:08:59 AM

To: Britt Martin <bmartin0211@outlook.com>

Cc: Gutierrez, Michael <gutierrez@butzel.com>; Silver, Lee <silver@butzel.com>; Burk, Tyler A. <burkt@butzel.com>

Subject: RE: Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

Brittany

Please let me know when you are available for a phone conference to discuss your request below. I'm tied up today and tomorrow, but I can make myself available on Wednesday, 7/3, anytime other than 10:00 a.m. – 12:00 p.m.

Daniel Hatch

Shareholder

hatchd@butzel.com

Direct: (616) 752-7224 | Mobile: (616) 250-1307



Main: 616.988.5600 | Fax: 616.988.5606

300 Ottawa Ave. NW, Suite 620 | Grand Rapids, MI 49503



From: Britt Martin <bmartin0211@outlook.com>

Sent: Monday, July 1, 2024 7:00 AM

To: Gutierrez, Michael <gutierrez@butzel.com>; Hatch, Daniel <hatchd@butzel.com>; Burk, Tyler A. <burkt@butzel.com>; Silver, Lee <silver@butzel.com>

Subject: [EXTERNAL] Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Leave to File Excess Word Count Response Brief

All,

I am writing regarding Defendants' Motion to Strike and Seal my amended complaint. As you are aware, the motion contests almost 1,000 numbered paragraphs, pages, and exhibits under broad statutory language of Rule 8, 10, and 12(f). The motion contests approximately **300 out of 1,752 paragraphs** and **550 out of 685 pages of exhibits**.

Given the extensive nature of the response needed to effectively demonstrate the context, relevance, and materiality of each contested paragraph, page, and exhibit, I anticipate needing more space than the current word count limit set by Local Rule 7.3(b)(i). While I am still in the process of drafting my response, I want to prepare for the possibility of needing to seek leave to exceed the word count limit.

Please let me know if you concur with or will oppose my potential motion for leave to file a response brief that exceeds the word count limits should it become necessary.

Thank you,

Brittany E. Martin

E: bmartin0211@outlook.com

P: (616) 822-9423

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

BRITTANY E. MARTIN,

Plaintiff,

v.

Case No. 24-cv-00072
Hon. Hala Y. Jarbou

HENN LESPERANCE PLC,
KEVIN LESPERANCE
MALGORZATA (“GOSIA”) WALKER,
ROY H. JOHNSON,
DOES 1-5,

Defendants.

**STIPULATION AND ORDER TO EXTEND THE TIME ALLOWED FOR PLAINTIFF
TO RESPOND TO DEFENDANTS’ MOTION TO STRIKE AND SEAL PLAINTIFF’S
FIRST AMENDED COMPLAINT**

Pro se Plaintiff, Brittany E. Martin, and Defendants, Henn Lesperance PLC, Kevin Lesperance, Malgorzata (“Gosia”) Walker, and Roy H. Johnson (collectively referred to as “Defendants”), stipulate and agree as follows:

1. The parties stipulate and agree to extend the time allowed for Plaintiff to respond to Defendants' motion strike and seal (ECF No. 75) until July 10, 2024.
2. Fed. R. Civ. P. Rule 6(b)(1)(A) provides that a Court may, for good cause, extend the time for an act to be done if a party makes such request before the original time or its extension expires.
3. On May 30, 2024, the parties stipulated to a briefing schedule (ECF No. 55), which the Court then entered the order on June 3, 2024, (ECF No. 64). The Order states, in relevant part:

“Defendants may file a motion to strike or seal Plaintiff’s amended complaint (ECF No. 17) pursuant to Rules 8, 12(f), or other applicable Rule no later than June 14, 2024;

Plaintiff shall have 21 days from the date Defendants file their motion to strike or seal to file her response to Defendants' motion to strike or seal."

4. Defendants' motion to strike and seal was filed on June 14, 2024, meaning Plaintiff's time to respond has not yet expired.
5. Good cause exists to grant this extension, as the adjournment will ensure that all parties are adequately prepared to contribute effectively to the proceedings, thereby facilitating a more equitable and efficient adjudication of the case.
6. Moreover, additional time is needed beyond the standard briefing schedule for dispositive and non-dispositive motions due to the sheer volume of material from Plaintiff's amended complaint that Defendants' contest and seek to strike and seal, the need for extensive legal research, and meticulous cross-reference document review.

STIPULATED FOR ENTRY:

Brittany E. Martin

Plaintiff in Pro Se
(616) 822-9423
23 College Ave. SE, APT. 18
Grand Rapids, MI 49503
bmartin0211@outlook.com

Lee T. Silver (P36905)

Michael L. Gutierrez (P79440)

Daniel J. Hatch (P79258)

Tyler A. Burk (P85077)

BUTZEL LONG, PC

*Attorneys for Henn Lesperance PLC,
Kevin Lesperance, Malgorzata
("Gosia") Walker, and Roy H. Johnson
300 Ottawa Ave. NW, Suite 620
Grand Rapids, Michigan 49503
silver@butzel.com
gutierrez@butzel.com
hatchd@butzel.com
*burkt@butzel.com**

ORDER

Upon consideration of the Parties' Stipulation to Extend the time allowed for Plaintiff to respond to Defendants' motion to strike and seal, the Court finds that good causes exists under Fed. R. Civ. P. 6(b)(1) to extend the time allowed for Plaintiff to respond to Defendants' strike and seal. The Court hereby orders that Plaintiff may file a response to Defendants' motion to strike and seal and no later than July 10, 2024.